

Exhibit F

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ROBERT BANDFIELD, et al.,

Defendants.

14-CR-476 (ILG)

AFFIDAVIT OF
GLENN A FAY BERGEY

STATE OF OREGON)
) ss:
COUNTY OF YAMHILL)

GLENN A FAY BERGEY, being duly sworn, deposes and says:

1. I am a United States citizen over 18 years of age. I am not a defendant in the above-captioned matter, but I write to provide the Court with information in connection with defendant Robert Bandfield's Pre-Trial Motions, specifically his motion to suppress the items taken in the search of IPC Corporate Service's offices in Belize and the evidence seized from Mr. Bandfield and me on the day of his arrest. This affidavit is based upon my own personal knowledge.
2. I am a resident of the State of Oregon, where I have lived for most of my life. I have been Robert Bandfield's life partner and common law wife since approximately November 2003.
3. Mr. Bandfield and I resided in Oregon until we moved to the country of Belize in approximately 2003. I continued to keep a residence in Oregon, but we spent the majority of our time in Belize, returning to the United States to visit friends and family.
4. Mr. Bandfield operated a company known generally as IPC, which provided offshore corporate and trust services in Belize. I was a full-time IPC employee. I was and am familiar with IPC's office and its employees.
5. For reasons relating to security concerns in Belize, I kept many of my personal items in the IPC office located at The Matalon Building in Belize City, Belize. Among the personal items I kept at the IPC office were the following:
 - a. My personal AT&T cellular telephone monthly statements;
 - b. My personal Wells Fargo monthly bank statements;
 - c. My personal Bank of America monthly bank statements;
 - d. My personal Waddell & Reed asset management statements;

- e. My personal and business-related Capital One credit card statements;
 - f. My personal American Express credit card statements;
 - g. My personal monthly power statements from McMinnville Power & Light relating to my Oregon property;
 - h. Files relating to BFG Group, LLC and BFG Consulting, LLC, both Nevada Companies for which I am manager;
 - i. Files relating to Salu Holdings LP, a Nevada Company that I own 97% of;
 - j. Files relating to Nevada Business Center LLC, which is the agent for the Nevada companies;
 - k. Files relating to Mountain Top Holdings LLC, an Oregon company that I am manager of, which holds property;
 - l. Files relating to Santiam Escrow Inc., which is a record keeper for my mortgage and payments;
 - m. Files relating to my life insurance with Genworth and SafeCo Insurance;
 - n. Ron Rowell CPA files relating to my personal U.S. taxes;
 - o. Files relating to a Storage Unit used to store my personal household items;
 - p. Files relating to Seminars Abroad, my former event-planning company;
 - q. Files relating to my attorney, Walter Gowell, and his work for me personally;
 - r. My personal Last Will & Testament;
 - s. My personal correspondence files containing correspondence with my son and daughter;
 - t. My personal Belize social security file;
 - u. My personal files regarding my pay sheets from Cornerstone Corporate Services for the accounting work I did for them; and
 - v. My personal instructions relating to my death wishes.
6. All of the above personal items were taken during the search and seizure of IPC's office on September 9, 2014 in connection with this case.
7. My understanding from friends and contacts in Belize is that the items seized on September 9, 2014 were delivered to Attorney Marilyn Williams Law Office for IPC on


December 14, 2014. However, the items were returned in a shambles. Two computers and several keyboards were broken; boxes and documents were left in disorganized piles; all of the previously-kept organization of the items was lost and all the materials were mixed up and jumbled together. I understand that some of IPC's items were mistakenly returned to other offices. Many files are still missing and have not been returned by the FIU.

8. No one has yet been able to fully sort through the mess of items that were delivered to Attorney Marilyn Williams Law Office for IPC. Therefore, I have not been able to retrieve my personal items, if they were indeed returned at all.
9. In addition, I was with Mr. Bandfield in Florida when he was arrested on September 9, 2014 as we were travelling from Florida /United States back to Belize. The agents who arrested Mr. Bandfield also seized my personal MacBook Air laptop computer, even though I was not under arrest.
10. Most, if not all, of the items on my MacBook Air laptop that was taken that day are personal in nature. Among other items, my laptop held the following:
 - a. Many photographs of my grandson, my family, friends, vacations, and various fund raising events in Belize with the First Lady, and pictures of our life there;
 - b. My personal banking excel spreadsheet;
 - c. My personal recipe files;
 - d. My personal Gmail account;
 - e. An electronic copy of my Last Will & Testament;
 - f. My personal floor plans for a house; and,
 - g. Other personal items of interest or hobby.
11. To date, my laptop has not been returned to me, nearly fifteen months after the time it was taken on September 9, 2014.
12. On October 17, 2014, I contacted one of the agents who seized my laptop and asked him when I would get it back. He told me that he no longer had the laptop and referred me to another agent.
13. I spoke with the second agent on October 24, 2014. I told him the reason for my call and asked when I would get my laptop back and why was my personal laptop taken when I was not arrested.
14. The agent began asking me questions about my relationship with Mr. Bandfield, what emails were on my laptop, and what other items I had on my laptop. He asked me to give him permission to search through my laptop and explained that I would get it back sooner

if I gave him my permission; otherwise, he stated that he would have to get permission from a judge, which would take longer. He made me very uncomfortable, so I did not give him permission to search my laptop and I ended the call.

15. However, prior to this conversation with the agent in October 2014, I was in Belize at the end of September of 2014 and I got a message on my iPad stating that my Yahoo! email account had just been added on my MacBook Air laptop. This was the laptop that was taken from me by the agents on September 9, 2014; it was not in my possession at the time I received the notice about the Yahoo! email, so I believe that one of the agents who took my personal laptop must have accessed it without my permission and, apparently, before they had a judge's permission.
16. I understand from Mr. Bandfield's attorneys that the United States Government first produced on November 3, 2015 imaged copies of my laptop and Mr. Bandfield's laptop that were taken during Mr. Bandfield's arrest more than a year after they were seized.
17. Without access to my personal laptop, and with the files in Belize in total disarray, it has been extremely difficult for me to carry on with my personal business, including filing my tax returns.

Dated: Dundee, Oregon
November 25, 2015


Glenna Fay Bergey

Subscribed and sworn to before me
this 25th day of November 2015.


Notary Public

